217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT –- NSPS SOURCE

PERMITTEE

ConAgra Food Ingredients Company-Alton
Attn: Brad Allen
145 West Broadway
Alton, Illinois 62002

Application No.: 10090023 I.D. No.: 119010ABK
Applicant's Designation: Date Received: October 20, 2010
Subject: Flour Milling
Date Issued: Expiration Date:
Location: 145 West Broadway, Alton, Madison County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Wheat Receiving (via Straight Truck, Hopper Truck, and Railcar) Dump Pits Controlled by a Baghouse;
Wheat Receiving via Barge;
Wheat Pre-Cleaning Controlled by a Baghouse;
Headhouse and Grain Handling (Drag Conveyors, Open Conveyors, and Bucket Elevators) Controlled by a Baghouse;
Grain Storage Bins (< 1,000,000 Bushels);
Grain Shipping (Truck, Railcar, and Barge);
Cleaning House Separators Controlled by a Baghouse;
Wheat Milling (Roller Mills, Sifters, Pneumatic Lifts, Dryers, Heat Treaters, Blending, and Storage) Controlled by a Baghouse;
Animal Feed Hammermill Controlled by a Baghouse;
Pelletizing – Pellet Cooler Controlled by Dual Cyclone Collectors;
Feed Shipping (via Truck and Railcar);
Flour Shipping (Packaged in Sacks or Bulk Truck or Railcar Loadout) Controlled by a Baghouse;
10.5 mmBtu/hour Natural Gas-Fired Boiler;
Phosphine Usage as an Insectide; and
Chlorine Usage for Bleaching Flour and Treatment of Water
Rail Car Loading Spout
Truck Loading Spout
Feed Rail Car Loadout Controlled by Mac Baghouse

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Particulate Matter less than 10 microns (PM_{10})). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.

b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.

c. This permit supersedes all operating permit(s) for this location.

2. The steam boiler is subject to the New Source Performance Standards (NSPS) for Small Industrial - Commercial - Institutional Steam Generating Units, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.

b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

d. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).

e. Pursuant to 35 Ill. Adm. Code 212.462, unless otherwise exempted pursuant to 35 Ill. Adm. Code 212.461(c) or (d), or allowed to use alternate control according to 35 Ill. Adm. Code 212.461(g), existing grain-handling operations with a total annual grain through-put of 300,000 bushels or more shall apply for an operating permit pursuant to 35 Ill. Adm. Code 201, and shall demonstrate compliance with the following:

i. Cleaning and Separating Operations.

A. Particulate matter generated during cleaning and separating operations shall be captured to the extent necessary to prevent visible particulate matter emissions directly into the atmosphere.

B. For grain-handling sources having a grain through-put exceeding 2 million bushels per year and located within a major population area, air contaminants collected from cleaning and separating operations shall be conveyed through air pollution control equipment which has a rated and actual particulate removal efficiency of not less than 98 percent by weight prior to release into the atmosphere.

ii. Major Dump-Pit Area.

A. Induced Draft.

I. Induced draft shall be applied to major dump pits and their associated equipment (including, but not limited to, boots, hoppers and legs) to such an extent that a minimum face velocity is maintained, at the effective grate surface, sufficient to contain particulate emissions generated in unloading operations. The minimum face velocity at the effective grate surface shall be at least 200 fpm, which shall be determined by using the equation:

$$V = Q/A$$

where:

V = face velocity; and

Q = induced draft volume in scfm; and

A = effective grate area in ft^2; and

II. The induced draft air stream for grain-handling sources having a grain through-put of not more than 2 million bushels per year or located outside a major population area shall be confined and conveyed through air pollution control equipment which has an overall rated and actual particulate collection efficiency of not less than 90 percent by weight; and

III. The induced draft air stream for grain-handling sources having a grain through-put exceeding 2 million bushels per year and located in a major population area shall be confined and conveyed through air pollution control equipment which has an

overall rated and actual particulate collection efficiency of not less than 98 percent by weight; and

IV. Means or devices (including, but not limited to, quick-closing doors, air curtains or wind deflectors) shall be employed to prevent a wind velocity in excess of 50 percent of the induced draft face velocity at the pit; provided, however, that such means or devices do not have to achieve the same degree of prevention when the ambient air wind exceeds 25 mph. The wind velocity shall be measured, with the induced draft system not operating, at a point midway between the dump-pit area walls at the point where the wind exits the dump-pit area, and at a height above the dump-pit area floor of approximately 2 ft; or

B. Any equivalent method, technique, system or combination thereof adequate to achieve, at a minimum, a particulate matter emission reduction equal to the reduction which could be achieved by compliance with 35 Ill. Adm. Code 212.462(b)(1).

iii. Internal Transferring Area.

A. Internal transferring area shall be enclosed to the extent necessary to prohibit visible particulate matter emissions directly into the atmosphere.

B. Air contaminants collected from internal transfer operations for grain-handling sources having a grain through-put exceeding 2 million bushels per year and located in a major population area shall be conveyed through air pollution control equipment which has a rated and actual particulate removal efficiency of not less than 98 percent by weight prior to release into the atmosphere.

iv. Load-Out Area.

A. Truck and hopper car loading shall employ socks, sleeves or equivalent devices which extend 6 inches below the sides of the receiving vehicle, except for topping off. Choke loading shall be considered an equivalent method as long as the discharge is no more than 12 inches above the sides of the receiving vehicle.

B. Box car loading shall employ means or devices to prevent the emission of particulate matter into the atmosphere to the fullest extent which is technologically and economically feasible.

C. Watercraft Loading. Particulate matter emissions generated during loading for grain-handling sources having a grain through-put exceeding 2 million bushels per year and located in a major population area shall be captured in an induced draft air stream, which shall be ducted through air pollution control equipment that has a rated and actual particulate removal efficiency of not less than 98 percent by weight prior to release into the atmosphere; except for the portion of grain loaded by trimming machines for which particulate matter emission reductions, at a minimum, shall equal the reduction achieved by compliance with 35 Ill. Adm. Code 212.462(d)(3)(A).

4. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air.

5. This permit is issued based on the source not being subject to the New Source Performance Standards (NSPS) for Grain Elevators, 40 CFR 60 Subpart DD, because the permanent storage capacity of the grain storage elevator is less than 35,200 m^3 (ca. 1 million bushels).

6. This permit is issued based on the source not being subject to the National Emission Standards (NESHAP) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63 Subpart DDDDDDD because the source does not uses a material containing chromium or a material containing manganese in the manufacturing of prepared feeds.

7. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

8a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.

b. Pursuant to 35 Ill. Adm. Code 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall

be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.

c. Pursuant to 35 Ill. Adm. Code 212.308, crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program.

d. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.

e. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:

   i. The name and address of the source;

   ii. The name and address of the owner or operator responsible for execution of the operating program;

   iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;

   iv. Location of unloading and transporting operations with pollution control equipment;

   v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;

   vi. Estimated frequency of application of dust suppressants by location of materials; and

   vii. Such other information as may be necessary to facilitate the Illinois EPA’s review of the operating program.

f. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.

g. Housekeeping Practices. Pursuant to 35 Ill. Adm. Code 212.461(b), all grain-handling and grain-drying operations, regardless of size, must implement and use the following housekeeping practices:

i. Air pollution control devices shall be checked daily and cleaned as necessary to insure proper operation.

ii. Cleaning and Maintenance.

A. Floors shall be kept swept and cleaned from boot pit to cupola floor. Roof or bin decks and other exposed flat surfaces shall be kept clean of grain and dust that would tend to rot or become airborne.

B. Cleaning shall be handled in such a manner as not to permit dust to escape to the atmosphere.

C. The yard and surrounding open area, including but not limited to ditches and curbs, shall be cleaned to prevent the accumulation of rotting grain.

iii. Dump Pit.

A. Aspiration equipment shall be maintained and operated.

B. Dust control devices shall be maintained and operated.

iv. Head House. The head house shall be maintained in such a fashion that visible quantities of dust or dirt are not allowed to escape to the atmosphere.

v. Property. The yard and driveway of any source shall be asphalted, oiled or equivalently treated to control dust.

vi. Housekeeping Check List. Housekeeping check lists to be developed by the Illinois EPA shall be completed by the manager and maintained on the premises for inspection by Illinois EPA personnel.

9a. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the baghouses and the dual cyclone collectors such that the baghouses and the dual cyclone are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.

b. The baghouses shall be in operation at all times when the associated with the rail dump pits, truck dump pits, and the barge load-out are in operation and emitting air contaminants.

c. Each dump pit shall be inspected for proper operation while receiving is occurring, at least once each week (Monday through Sunday) when grain is received.

d. The grain elevator shall be inspected for presence of visible emissions from internal transfer and cleaning, while such activity is occurring, at least once each week when such activity is performed.

e. Grain load-out socks, sleeves or equivalent devices shall be inspected for proper operation while load-out is occurring, at least once each week when grain load-out is performed.

f. The steam boiler shall only be operated with natural gas as the fuel. The use of any other fuel in the steam boiler requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

g. The feed produced at the source shall not use any material containing chromium or any material containing manganese. The production of feed at the source material containing chromium or a material containing manganese requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

10a. The amount of material handled by the source shall not exceed the following limits:

i. The amount of wheat receipts shall not exceeded 61,000 tons per month and 610,000 tons per year;

ii. The amount of grain received, that is, unloaded in the dump pit areas at the elevator shall not exceed 242,000 tons per month and 2,420,000 tons per year;

iii. The amount of wheat shipped, that is, loaded into a vehicle in the load-out areas at the elevator shall not exceed 7,400 tons per month and 74,000 tons per year;

iv. The amount of flour produced shall not exceed 29,420 tons per month and 394,200 tons per year;

v. The amount of feed produced shall not exceed 6,000 tons per month and 60,000 tons per year; and

vi. Animal feed hammermilling shall not exceed 350 tons per month and 3,500 tons per year.

b. Emissions and operation of the grain handling, flour milling operation, and feed manufacturing operation shall not exceed the following limits:

	Throughput*		E M I S S I O N S					
			PM			PM_{10}		
Emission Unit	(T/Mo)	(T/Yr)	(lb/T)	(T/Mo)	(T/Yr)	(lb/T)	(T/Mo)	(T/Yr)
Wheat Receiving – Straight Truck**	61,000	610,000	0.18	0.06	0.55	0.059	0.02	0.18
Wheat Cleaning**	61,000	610,000	0.75	0.23	2.29	0.19	0.06	0.58
Enclosed Internal Transfer (Headhouse)**	244,000	2,440,000	0.061	0.07	0.74	0.034	0.04	0.41
Storage Bin Vents**	244,000	2,440,000	0.025	0.03	0.31	0.0063	0.01	0.08
Grain Shipping - Truck/Barge Loadout	7,400	74,000	0.086	0.32	3.18	0.029	0.11	1.07
Cleaning House Separators**	56,940	569,400	0.12	0.03	0.34	0.06	0.02	0.17
Wheat Milling+	56,940	569,400	70.00	9.97	99.65	35.00	4.98	49.82
Animal Feed Hammermill**	350	3,500	6.70	0.01	0.12	3.35	0.01	0.06
Pelletizing – Pellet Cooler++	6,000	60,000	3.60	1.08	10.80	1.80	0.54	5.40
Feed Shipping	17,520	175,200	0.0033	0.03	0.29	0.0008	0.01	0.07
Flour Shipping (including Packaging)**	39,420	394,200	0.72	0.14	1.42	0.46	0.09	0.91
				Totals:	119.68			58.75

* one bushel = 60 lbs (wheat)
** controlled by baghouse (99% overall control efficiency)
+ controlled by baghouse (99.5% overall control efficiency)
++ controlled by dual cyclone collectors (90% overall control efficiency)

These limits are based the maximum throughput of the grain storage elevator, standard emission factors (Table 9.9-1, AP-42, Fifth Edition, Volume I, Update 2003, May 2003) and applicable controls (99 percent control efficiency for baghouse controlling dump pits, 99 percent control efficiency for enclosed internal transfer, 99.5 percent control efficiency for wheat milling baghouse, and 90 percent control efficiency for cyclone.

c. Operation and emissions of the flour heat treatment operation shall not exceed the following limits:

i. Annual flour production: 9,800 tons/month, 98,000 tons/year,

ii. Particulate matter emissions from the flour heat treatment operation:

	Throughput			E M I S S I O N S PM			PM_{10}	
Emission Unit	(T/Mo)	(T/Yr)	(lb/T)	(T/Mo)	(T/Yr)	(lb/T)	(T/Mo)	(T/Yr)
Flour Heat Treatment	9,800	98,000	3.14	0.15	1.54	1.10	0.05	0.54
Flour Cooling	9,800	98,000	3.14	0.15	1.54	1.10	0.05	0.54
Flour Loadout Bins (Total)	39,200	392,000	3.14	0.62	6.15	1.10	0.22	2.16
				Total:	9.23			3.24

iv. These limits are based on the maximum flour heat treatment throughput of 98,000 tons/year, standard emission factors (Table 11.12-2, AP-42, Fifth Edition, Volume I, Update 2006, June 2006), and 99% control efficiency for filters.

d. Operation and emissions of the boiler shall not exceed the following limits:

i. Natural Gas Usage: 9.20 mmscf/month, 91.98 mmscf/year.

ii. Emissions from the combustion of natural gas:

Pollutant	Emission Factor (lbs/mmscf)	Emissions (Tons/Mo)	(Tons/Yr)
Carbon Monoxide (CO)	84.0	0.39	3.86
Nitrogen Oxides (NO_x)	100.0	0.46	4.60
Particulate Matter (PM)	7.6	0.04	0.35
Sulfur Dioxide (SO_2)	0.6	0.01	0.03
Volatile Organic Material (VOM)	5.5	0.03	0.25

These limits are based on the maximum firing rate (10.5 mmBtu/hour), a heat content of 1,000 Btu/scf for natural gas, 8,760 hours per year of operation, and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

e. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

11. This permit is issued based on the Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit.

12a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing

requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

b. Testing required by Condition 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

13. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person’s own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.

14a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and

performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.

15a. i. Pursuant to 40 CFR 60.48c(g)(1), except as provided under 40 CFR 60.48c(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each operating day.

ii. Pursuant to 40 CFR 60.48c(g)(2), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO_2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

iii. Pursuant to 40 CFR 60.48c(g)(2), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to 40 CFR 60 Subpart Dc) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO_2 standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

b. Pursuant to 40 CFR 60.48c(i), all records required under 40 CFR 60.48 shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

16. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The

record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

17. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

i. Records addressing use of good operating practices for the dust collectors, cyclones, scrubbers, filter receivers, socks, and biogas flare:

A. Records for periodic inspection of the dust collectors, cyclones, scrubbers, filter receivers, socks, and biogas flare with date, individual performing the inspection, and nature of inspection; and

B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

ii. Records of housekeeping check lists;

iii. Records for the inspections required by Conditions 9(c), (d) and (e), with date, time and observations if such information is not incorporated in the housekeeping check list.

iv. Total grain received (tons/month and tons/year);

v. The amount of wheat shipped (tons/month and tons/year);

vi. The amount of flour produced (tons/month and tons/year);

vii. The amount of feed produced (tons/month and tons/year);

viii. Animal feed hammermilling throughput (tons/month and tons/year);

ix. Natural gas usage (mmscf/month and mmscf/year); and

x. Monthly and aggregate annual emissions of CO, NO_x, PM, PM_{10}, SO_2, and VOM from source with supporting data and calculations (tons/month and tons/year).

b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

19. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

20a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA’s Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

If you have any questions on this permit, please contact Mike Dragovich at 217/782-2113.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:MJD:psj

cc: Illinois EPA, Region 3
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Flour Milling Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons/year of PM_{10}) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

	E M I S S I O N S (Tons/Year)					
Emission Unit	CO	NO_x	PM	PM_{10}	SO_2	VOM
Wheat Receiving – Straight Truck			0.55	0.18		
Wheat Cleaning			2.29	0.58		
Enclosed Internal Transfer (Headhouse)			0.74	0.41		
Storage Bin Vents			0.31	0.08		
Grain Shipping - Truck/Barge Loadout			3.18	1.07		
Cleaning House Separators			0.34	0.17		
Wheat Milling			99.65	49.82		
Animal Feed Hammermill			0.12	0.06		
Pelletizing – Pellet Cooler			10.80	5.40		
Feed Shipping			0.29	0.07		
Flour Shipping (including Packaging)			1.42	0.91		
Flour Heat Treatment			1.54	0.54		
Flour Cooling			1.54	0.54		
Flour Loadout Bins (Total)			6.15	2.16		
Fuel Combustion	3.86	4.60	0.35	0.35	0.03	0.25
Totals	3.86	4.60	129.26	62.34	0.03	0.25

MJD:psj